

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

---

Deborah Laufer,  
Plaintiff

Vs.

Case No. 3:20-cv-00681-SLC

PM Jay, LLC dba Park Motel,  
Defendant

---

ANSWER TO ADA COMPLAINT

---

1. Responses to the Claims in the Complaint

- A. Defendant denies each and every allegation in the Complaint except those specifically admitted in this Answer.
- B. Defendant admits all the allegations in the following paragraphs: 3, 4, 5, 6, 7, 8.
- C. Defendant does not know or have enough information to form a belief as to whether the allegations in the following paragraphs are true: 1, 2, 9, 10, 11.

2. Affirmative Defense

- A. Plaintiff lacks standing because Plaintiff was not deterred from visiting the premises, nor can Plaintiff establish intent to visit the premises in the future.
- B. The facility was first occupied before January 26, 1993, has not been altered to affect the usability of the facility since that time, and removal of alleged barriers is not readily achievable.
- C. Defendant provided adequate access to its business to persons with disabilities by using methods such as customer service, specifically, the website states to contact the property if you have requests for specific accessibility needs.

3. Demand for Relief

WEREFORE, Defendant demands:

- 1. That the Court enter judgment dismissing the Complaint;

2. That Defendant be awarded costs incurred;
3. That Defendant be awarded such other costs and further relief as the Court may deem just.

Respectfully submitted,

Electronically signed by Shari L. Post  
Shari L. Post, attorney for Defendant

Dated: 11/18/2020